

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
DILLON JORDAN,	:	
a/k/a "Daniel Jordan,"	:	21 Cr. 423 (JPC)
a/k/a "Daniel Maurice Hatton,"	:	
a/k/a "Daniel Bohler,"	:	
	:	
Defendant.	:	
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WHEREAS, on or about June 24, 2021, DILLON JORDAN, a/k/a "Daniel Jordan," a/k/a "Daniel Maurice Hatton," a/k/a "Daniel Bohler," (the "Defendant"), was charged in a four-count Indictment, 21 Cr. 423 (JPC) (the "Indictment"), with conspiracy to violate the Mann Act, in violation of Title 18, United States Code, Section 371 (Count One); enticement, in violation of Title 18, United States Code, Sections 2422(a) and 2 (Count Two); use of interstate commerce to promote unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2 (Count Three); and concealment money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2 (Count Four);

WHEREAS, the Indictment included a forfeiture allegation as to Counts One and Two of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 2428, of any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of the offenses charged in Counts One and Two of the Indictment; and any and all property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses charged in Counts One and Two of the Indictment, including but not limited to a sum of money in United States currency representing

the proceeds traceable to the commission of the offenses charged in Counts One and Two of the Indictment;

WHEREAS, on or about Sept 1, 2022, the Defendant pled guilty to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Indictment and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 2428 a sum of money equal to \$1,429,717 in United States currency, representing proceeds traceable to the commission of the offense charged in Count One of the Indictment,

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$1,429,717 in United States currency, representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Cecilia E. Vogel, of counsel, and the Defendant, and his counsel Ilana Haramati, Esq., and Henry Mazurek, Esq., that:

1. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$1,429,717 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant DILLON JORDAN, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: Cecilia Vogel
CECILIA E. VOGEL
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-1084

8/31/22
DATE

DILLON JORDAN

By: [Signature]
DILLON JORDAN

8/31/2022
DATE

By: [Signature]
ILANA HARAMATI, ESQ.
HENRY MAZUREK, ESQ.
JASON SER, ESQ.
Attorneys for Defendant
125 Park Avenue, 7th Floor
New York, NY 10017

8/31/22
DATE

SO ORDERED:

[Signature]
HONORABLE JOHN P. CRONAN
UNITED STATES DISTRICT JUDGE

10/19/2022
DATE